

MRSA

CDCR HQ has issued a memo (attached) directing all institutions to develop local MRSA procedures. Therefore, if they have not already begun, local institutional management will shortly begin to develop the local MRSA IPPs which will include site specific issues. The statewide MRSA settlement agreement allows for local discussion regarding the content of the local MRSA OPs.

We suggest you contact your Warden as soon as possible to set up meetings for discussion regarding MRSA issues. Some areas of consideration when reviewing the local MRSA policy may include:

Training - Who, what, when, and where the training sessions on MRSA issues will occur. Training should be a part of the 40 hour Block Training.

Participation on Infectious Disease and Exposure Control Committees when BU6 issues are on the agenda - Dialogue at these committee meetings often include errors made by staff and the need to make alterations to procedures. Participation by BU6 staff would serve as a valuable training tool, and provide BU6 the ability to pass on this valuable information to BU6 staff.

Nitrile Gloves - Nitrile gloves are stronger, provide a higher level of protection and need replacement less frequently.

Personal Hand Sanitizer - Personal hand hygiene is a primary method of protection against MRSA exposure. Where the state hand sanitizers are located and how the institution will ensure that the alcohol based sanitizer will be "inmate tamper proof" are issues of concern. The statewide approved, tamper-proof box containing the state provided dispenser does not allow the officer to see what is in the area into which the officer must place his/her hand. There are indications that some correctional staff are not inclined to use the state provided dispenser for fear of injury. Personal hand sanitizers allow for immediate use rather than seeking out a state hand sanitizer wall dispenser. This might be an issue for discussion.

Identification of MRSA infected inmates - BU6 staff have suffered serious illness, loss of body parts, medical retirement and death due to MRSA infections. Knowledge of inmates infected with active MRSA allows for heightened vigilance (above and beyond universal precautions) exercised by staff when dealing with these inmates. Unlike bloodborne pathogens, MRSA may remain viable on surfaces for long periods of time. Staff may, unknowingly, come in contact with MRSA (perhaps on the surface of latex gloves) and spread MRSA throughout the institution. Further, compliance with various aspects of the MRSA policy such as the need for private showers, private rooms, limitation of activities, etc., only make sense when custodial staff have knowledge inmates infected with MRSA infection. HIPPA and State Health and Safety codes allow for the release of medical information to custodial staff.

Laundering of Inmate personal clothing - Inmates are allowed to possess personal clothing. Some institutions do not have a mechanism in place for the laundering of such clothing. Institutional canteens sell laundry detergent. Some inmates use toilets and sinks to launder personal clothing. MRSA present on clothing is destroyed when laundered in water of at least 160 degrees. A MRSA infected inmate who launders personal clothing in a toilet or sink, not only spreads the MRSA throughout the institution, but potentially spreads bacteria present in fecal matter and urine. Local institutions must give serious consideration as to how to ensure the proper laundering of inmate clothing. At least one institution has been cited by Cal OSHA (attached) for ignoring the laundry issue.

Use of proper PPE kits - In institutions, equipment contained in PPE kits provide different levels of protection. For example, some have 5 mil latex gloves, some have 10 mil.(10 mil is essential). Some have non-porous jumpsuits (cleaning areas potentially contaminated with MRSA should be done in non-porous jumpsuits), some do not. CCPOA believes that medical staff be should be required to inform custodial staff of the appropriate PPE to utilize specific to each inmate with a communicable disease. This would allow for the heightened precautions necessary to prevent the spread of MRSA, and for the proper disposal of protective equipment (gloves, etc.) after dealing with a MRSA infected inmate.

Memorandum

Date :

To. : Wardens
Superintendents
Regional Administrators, Correctional Health Care Services
Facility Administrators, California Prison Health Care Services, Public Health Unit

Subject: **EXPOSURE CONTROL PLAN – METHICILLIN-RESISTANT STAPHYLOCOCCUS AUREUS**

The California Department of Corrections and Rehabilitation (CDCR) has completed its formulation of a statewide exposure control plan template to address methicillin-resistant *Staphylococcus aureus* (MRSA). The template meets requirements set forth in the June 9, 2009, *Special Order* issued by the California Occupational Safety and Health Appeals Board (OSHAB) in response to MRSA exposure-related Cal/OSHA citations and the Special Order first issued at Folsom State Prison (FSP). Several other CDCR institutions were also cited during 2008 and similar Special Orders will be issued reflecting the Joint Voluntary Agreement (JVA), setting forth requirements for the CDCR. The expectation of the OSHAB and Cal/OSHA is the MRSA Exposure Control Plan (ECP) will be implemented at each CDCR custodial location (i.e., institutions and facilities, including transportation) statewide.

The MRSA ECP template and the accompanying appendices have been developed for use by all CDCR custodial locations. The template is designed to provide uniform guidance and structure for developing the required site-specific MRSA ECPs. The MRSA ECP template contains the minimum requirements for all CDCR locations to comply with the JVA.

The intent of having each custodial location develop its own MRSA ECP from the template is to eliminate or minimize the risk of employee and inmate exposure to infectious agents in the workplace, specifically *Staphylococcus aureus* and MRSA, and to prevent infection and disease that might occur as a result of exposure to those agents. This purpose is served through the education of employees, utilization of appropriate work practices, the use of protective equipment, maintaining sanitary working conditions, and adherence to the recommendations and advisory information issued by various public health organizations.

Wardens and Superintendents are responsible for ensuring that each custodial location customizes the ECP template to meet site-specific operational needs without deviating from the master ECP template when the effect of such deviations would be to negate the purpose or minimize the effectiveness of the MRSA ECP. For instance, site-specific additions to address the physical layout of an institution/facility would be appropriate; however, altering the approved processes contained in the ECP template would not.

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The site-specific MRSA ECPs for each custodial location must address all of the following elements contained in the MRSA ECP template:

- Education
- Correctional Standard Precautions as Application to MRSA
- Hand Hygiene Program
- Personal Protective Equipment
- Environmental Sanitation
- Sanitation Tools and Equipment
- Laundry
- Transports, Vehicles and Equipment
- Infection Control Program for Individuals Under Custody
- Employee Exposure and Medical Records
- Recordkeeping Requirements

Surveillance (Tracking of Exposure) Procedures

The JVA requires CDCR to develop procedures for the tracking and reporting of incidences of exposure to MRSA (i.e., "surveillance"). The California Prison Health Care Services, Public Health Unit, will take the lead in developing such procedures pertaining to inmates. CDCR will similarly develop "surveillance" procedures as they relate to employees.

Education

A MRSA ECP lesson plan was developed and approved by the CDCR Office of Professional Training and Development and has been provided to the In-Service Training program at each institution and DJJ facility.

Initial and annual training is required. Please prepare and submit a copy of your initial training schedule when submitting your site-specific MRSA ECP. Annual training must be provided to all employees and, where applicable, employees will receive the training as part of their required 40-hour block training schedule.

Timelines

On or before April 30, 2010, each adult institution, transportation hub, and juvenile facility shall prepare and e-mail a copy of their site-specific draft MRSA ECP

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(in Microsoft [MS] Word format) and initial training schedule to Stefanie Bertelsen, Health and Safety Officer, Facility Planning, Construction and Management (FPCM), at stefanie.bertelsen@cdcr.ca.gov.

Once the draft MRSA ECPs have been reviewed and approved for consistency with the master MRSA template, you will be notified to distribute and implement the ECP.

Access

The site-specific MRSA ECP documents shall be maintained in the facility or institution, and shall be made available upon request to all employees, their representatives, and representatives of Cal/OSHA and/or the California Department of Public Health. These documents should be reviewed yearly and updated as often as needed.

The MRSA ECP template can be found in MS Word format and downloaded by visiting the CDCR intranet website at <http://intranet/ADM/fp/OHS/Documents/Forms/AllItems.aspx> and downloading file MRSA_ECP_Template-22MAR10.zip. A copy of FSP's completed MRSA ECP is also available as an example on the CDCR website.

Input

Institutions are not authorized to negotiate the contents of their local ECP with any union representatives. As required by the JVA, local ECPs must be consistent with the statewide template. The ECP template, however, should be provided to local union representatives so they will have an opportunity to provide input if they choose to do so. Union input to the ECP can be provided through Wardens' meetings, Health and Safety Committee meetings, or other appropriate forums conducive to receiving input. Once the local ECP has been developed, it must be sent to Stefanie Bertelsen as described above.

If you have questions about this or related issues, please contact Nikki Baumrind, Chief, Public Health Section, Environmental Services Branch, at (916) 255-5526.

DEBORAH HYSEN

Chief Deputy Secretary

Facility Planning, Construction, and Management

Wardens

Superintendents

Regional Administrators, Correctional Health Care Services

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State of California

Division of Occupational Safety and Health
Cal/OSHA San Diego District (0950632; 4032)
7575 Metropolitan Drive, Suite 207
San Diego, CA 92108

Inspection Number: 310815584
Inspection Dates: 03/21/2008 - 09/04/2008
Issuance Date: 09/08/2008
CSHO ID: P8116
Optional Inspection Nbr: 013-08



Phone: (619) 767-2280 Fax: (619) 767-2299

Citation and Notification of Penalty

Company Name: CALIPATRIA STATE PRISON
Inspection Site: 7018 BLAIR RD, CALIPATRIA, CA 92233

Citation 2 Item 1 Type of Violation: **Serious**

T8 CCR 3203(a)(6)(A). Injury and Illness Prevention Program

(a) Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program (Program). The Program shall be in writing and, shall, at a minimum:

(6) Include methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard:

(A) When observed or discovered;

Site: 7018 Blair Road, Calipatria CA

At the time of this inspection, the employer had not established, implemented and maintained an injury illness prevention program which included methods and procedures to address the hazards associated with Methicillin - Resistant Staphylococcus Aureus (MRSA).

Hazards that lead to employee exposure to the MRSA bacteria in the work environment which are not being addressed include:

- 1). The Prison did not have effective procedures for the disposal of contaminated dressings in the general housing areas.
- 2). The Prison did not establish an effective means to disinfect personal Inmate clothing as part of the laundering process.
- 3). The Prison did not establish effective procedures for the handling and laundering/disinfecting of state provided clothing.
- 4). The Prison did not establish, implement and maintain effective procedures for the treatment of inmate MRSA infections during hours in which the Level 1 infirmary was closed including evenings, nights and weekends.
- 5). The Prison did not establish effective training of inmate porters responsible for the cleaning and disinfecting of the prison environment. Inmates were not trained on the cleaning and disinfecting procedures which they were to follow to prevent transmission of communicable diseases such as MRSA to prison employees.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

State of California

Division of Occupational Safety and Health
Cal/OSHA San Diego District (0950632; 4032)
7575 Metropolitan Drive, Suite 207
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Date By Which Violation Must be Abated:	09/19/2008
Proposed Penalty:	\$ 6750.00

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